

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No. 1:20-CV-00241

PENNY WORLSEY,	)	
	)	
PLAINTIFF	)	
	)	
v.	)	
	)	
BAGWELL HOLT SMITH P.A.,	)	<b><u>DEFENDANT BAGWELL HOLT</u></b>
AMBERLYNN VALLEY	)	<b><u>SMITH P.A.'S MOTION FOR</u></b>
HOMEOWNERS ASSOCIATION, INC.	)	<b><u>EXTENSION OF TIME TO SERVE A</u></b>
AND COMMUNITY ASSOCIATION	)	<b><u>RESPONSIVE PLEADING</u></b>
MANAGEMENT, LIMITED,	)	
DEFENDANT	)	

Defendant Bagwell Holt Smith, P.A. ("Bagwell"), through counsel, respectfully states to the Court that additional time is needed for the investigation and preparation of a responsive pleading or other response to the Complaint in the above case, and respectfully moves the Court for an extension of time within which to serve a responsive pleading or otherwise respond.

In support of this Motion, Bagwell shows the Court as follows:

1. The Complaint in this action was served on Bagwell on March 17, 2020.
2. The time for answering or presenting other defenses does not expire until April 7, 2020.

3. There is additional information which needs to be reviewed before the undersigned will be in a position to adequately prepare and serve a responsive pleading or other response to the Complaint.
4. This motion is filed in good faith for the reasons stated and not for purposes of delay.
5. Counsel for Plaintiff consents to this extension of time.

WHEREFORE, Defendant Bagwell Holt Smith, P.A., prays the Court extend the time for Bagwell to prepare and serve a responsive pleading or otherwise respond to the Complaint up to and including May 12, 2020.

CRANFILL SUMNER & HARTZOG LLP

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on April 3, 2020 the forgoing *Motion Requesting an Extension of time to Answer Complaint* was filed via CM/ECF, which automatically served counsel of record as set out below:

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